



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WK:VC
F. #2023R00955

*271 Cadman Plaza East
Brooklyn, New York 11201*

June 13, 2024

By E-Mail and ECF

Allegra Glashausser, Esq.
Federal Defenders of New York, Inc.
One Pierrepont Plaza, 16th Floor
Brooklyn, NY 11201
allegra_glashausser@fd.org

Re: United States v. Joseph Grunwald
Criminal Docket No. 24-19 (NRM)

Dear Counsel:

Enclosed please find additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the government's previous disclosures on March 20, 2024, April 25, 2024 and May 2, 2024. The discovery is being provided to you via USAfx. Please promptly download the material and confirm in writing that you were able to do so. The government also requests reciprocal discovery from the defendant.

Please note that some of this material is considered Victim Discovery Material as that term is defined in the March 20, 2024 Protective Order in this matter. (See ECF No. 14.) As such, PDF files containing Victim Discovery Material have been marked as "Victim Discovery Material" on each page, and non-PDF files have been marked as "Victim Discovery Material" in the file name.

The government discloses the following:

- A draft transcription and translation of a previously produced screen recording of a Telegram conversation (JG_002129) between the defendant and the victim described in the indictment (hereinafter "Child Victim-1"), bearing Bates numbers JG_002130 - JG_002247 (Victim Discovery Material).
- Reproduction to address technical issue of previously produced text messages (JG_000001 - JG_000003) between the defendant and Child Victim-1, bearing Bates number JG_002248 (Victim Discovery Material).

- Reproduction to address technical issue of previously produced Telegram messages (JG_000004 - JG_001874) between the defendant and Child Victim-1, bearing Bates number JG_002249 (Victim Discovery Material).
- Reproduction to address technical issue of previously produced TextNow messages (JG_001875 - JG_001977) between the defendant and Child Victim-1, bearing Bates number JG_002250 (Victim Discovery Material).
- Cell-site location data and related records from Verizon showing the location of cellphones belonging to the defendant from April 1, 2023 through May 4, 2023 and June 1, 2023 through June 26, 2023, bearing Bates numbers JG_002251 - JG_002334.
- Cell-site location data and related records from T-Mobile showing the location of a cellphone belonging to the defendant from April 1, 2023 through May 4, 2023 and June 1, 2023 through June 26, 2023, bearing Bates numbers JG_002335 - JG_002370.
- Credit card statements from Capital One for the defendant from the period of July 4, 2022 through April 3, 2024, bearing Bates numbers JG_002371-JG_002441.
- A search warrant and related documents, No. 24-MJ-2, issued on January 2, 2024, bearing Bates numbers JG_002442 - JG_002503 (Victim Discovery Material).
- A search warrant and related documents, No. 24-MJ-39, issued on January 18, 2024, bearing Bates numbers JG_002504 - JG_002599 (Victim Discovery Material).
- A search warrant and related documents, No. 24-MC-1222, issued on March 26, 2024, bearing Bates numbers JG_002600 - JG_002691 (Victim Discovery Material).

- A search warrant and related documents, No. 24-MC-1687, issued on April 25, 2024, bearing Bates numbers JG_002692 - JG_002789 (Victim Discovery Material).

Very truly yours,

BREON PEACE
United States Attorney

By: /s/ Vincent Chiappini
Vincent Chiappini
Assistant U.S. Attorney
(718) 254-6299

Enclosures

cc: Clerk of the Court (NRM) (without enclosure)